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FEB 17 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

Shana Lee McCart-Pollak  
524 Blanche Court  
Henderson, Nevada 89052  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHANA LEE MCCART-POLLAK,  
Plaintiff,

vs.

ON DEMAND DIRECT RESPONSE LLC,  
Delaware company, ON DEMAND DIRECT  
RESPONSE III LLC, Delaware company;  
BRETT SAEVITZON, individual; CRAIG  
SHANDLER, individual; JEFFREY MILLER,  
individual; MARK MEYERS, individual;  
DOES I-X; ROE BUSINESS ENTITIES I-  
X;

Defendants

Case No: 2:20-cv-01624-GMN-VCF

**JOINT STUPULATION TO EXTEND  
DISCOVERY DEADLINES**

Comes now, Plaintiff Shana Lee McCart-Pollak ("Pollak") in proper person,  
Defendant Mark Meyers ("Meyer") in proper person, and Defendants Brett Saevitzon  
("Saevitzon") and Craig Shandler ("Shandler"), by and through their undersigned counsel,  
respectfully moves the Court to extend the Discovery Deadlines by at least sixty ("60")  
days.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Good cause is shown as pending in the court are a Motion to Compel, Protective  
Order(s), as well as, Motion(s) to Dismiss.

Discovery still needed to completed. If the Court grants Pollak's Motion to Compel,  
and a "private and Confidential" Protective Order, then once documents have been  
JOINT STUPULATION TO EXTEND DISCOVERY DEADLINES - 1

1 provided by Defendants, Pollak intends to depose Saevitzon and Shandler, as well as,  
2 have an expert opine on whether the Corporate shield has been pierced by analyzing the  
3 documents to determine if the companies were properly formed, adequately capitalized,  
4 all entities functioned arm lengths away from each other, etc. If the Court grants  
5 Defendants Motions to Dismiss then discovery would cease. Therefore, it would not harm  
6 Defendants who have stipulated to at least a sixty day extension, but would prejudice  
7 Pollak to not have the deadlines extended to allow full discovery.  
8

9 Currently the following Deadlines exist:

10 Expert Disclosures **February 17, 2022**

11 Rebuttal Expert Disclosures **March 18, 2022**

12 Discovery Cut-off **April 18, 2022**

13 Dispositive Motion **May 18, 2022**

14 Pretrial Order Due **June 17, 2022**

15  
16  
17  
18 WHEREFORE, the parties, hereby jointly stipulate and respectfully move this  
19 Court to enter an Order extending the deadlines to at least a sixty (60) day extension.  
20 Proposing new discovery deadlines as:

21 Expert Disclosures extended to, at the very least, **April 18, 2022**

22 Rebuttal Expert Disclosures to, at the very least, **May 17, 2022**

23 Discovery Cut-off to, at the very least, **June 17, 2022**

24 Dispositive Motion to, at the very least, **July 18, 2022**

25 Pretrial Order Due to, at the very least, **August 16, 2022**

1  
2 Dated this <sup>24</sup>16 day of February, 2022  
3

4 Shana Lee McCart-Pollak  
5 Signature  
6 Shana Lee McCart-Pollak  
7 524 Blanche Court  
8 Henderson, Nevada 89052  
9 Tel: (702) 439-2263  
10 Email: Lotsoflovebuddies@yahoo.com  
11 Pro Se

12 Dated this 15th day of February, 2022  
13

14 Mark Meyers  
15 Mark Meyers  
16 1037 Barrow Court  
17 Westlake Village, CA 91361  
18 Tel: (805) 338-0289  
19 Email: mark@kobeproducts.com  
20 Pro Se

21 Dated this 15<sup>th</sup> day of February, 2022  
22

23 IT IS SO ORDERED.

24 Cam Ferencbach

25  
26 Cam Ferencbach  
27 United States Magistrate Judge

28 DATED 2-22-22

David K. Dorenfeld

David K. Dorenfeld  
(Cal. Bar No. 145056 Pro Hac Vici)  
30101 Agoura Court, Suite 210  
Agoura Hills, CA 91301  
Tel: (818) 865-4000  
Email: david@dorenfeld law.com

**CERTIFICATE OF SERVICE**

I, Shana Lee McCart-Pollak, declares as follows, I am over the age of 18 years:

My address is: 524 Blanche Court  
Henderson, Nevada 89052  
(702) 439-2263

On February 17, 2022, I served the foregoing document(s) described as:

**Joint Stipulation To Extend Discovery Deadlines**

I hereby certify that on the 17<sup>th</sup> day of February, 2022, a true and complete copy of the foregoing was served on all counsel of record by mail to the addresses indicated below:

Dorenfeld Law  
30101 Agoura Court, Suite 210  
Agoura Hills, California 91301

Mark Meyers  
1037 Barrow Court  
Westlake Village, California 91361

I declare under penalty of perjury that the foregoing is true and correct.

  
Shana Lee McCart-Pollak